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May 4, 2011

Ms. Felicia Jackson  
Cost Recovery Specialist  
U.S. Environmental Protection Agency, Region 4  
Superfund Enforcement and Information Management Branch  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8909

Re: Request for Information Pursuant to Section 104(e) of CERCLA and  
Section 3007 of RCRA for the Wright Chemical Corporation Superfund  
Site in Riegelwood, Columbus County, North Carolina (Site #A4XW)

Dear Ms. Jackson:

This firm represents William Gilchrist Wright Properties, Inc., Respondent and this letter is submitted on its behalf in response to the Information Request Letter dated April 5, 2011, and received April 7, 2011, addressed to Wright Chemical Corporation, William Gilchrist Properties, Inc., c/o Thomas H. Wright, President. Wright Chemical Corporation no longer exists, the name having been changed in 2007 to William Gilchrist Wright Properties, Inc.

This Response and the Asset Purchase Agreement with relevant closing documents are submitted in good faith based on the best knowledge and information, and the fact that all records of Wright Chemical Corporation were delivered to the possession of Oak-Bark Corporation when the Asset Purchase Agreement closed on or about November 30, 2004. Respondent and its Chairman make no admissions of liability in reference to the Site. This Response, the Asset Purchase Agreement, and the relevant documents connected with the closing of the sale are confidential and are protected to the maximum extent allowed by law.

Respondent and its Chairman reserve the confidentiality of attorney-client communications and attorney work product, which are not waived.



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# U.S. EPA REGION IV

## SDMS

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The following Responses are submitted to the Request for Information:

### REQUESTS

1. Identify the person(s) answering these Questions on behalf of Respondent.

**Response:**

Thomas H. Wright III  
William Gilchrist Wright Properties, Inc.  
One Page Avenue, Suite 101  
Asheville, NC 28801

2. For each and every Question contained herein, identify all person consulted in the preparation of the answer.

**Response:**

None. The office of the company is in Asheville and Thomas H. Wright III lives there.

3. For each and every Question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.

**Response:**

None except for the Asset Purchase Agreement and closing documents when the chemical assets and the plant property then owned by Wright Chemical Corporation was sold to Oak-Bark Corporation in November 2004. All documents related to the Site and Respondent's records of management of the Site were included in the sale and were delivered to the possession of buyer, Oak-Bark Corporation. Notice of receipt of the Requests by Respondent has been given to Oak-Bark which has advised that it will furnish to Respondent a Compact Disc of the documents relevant to the Requests, but to date, it has not been received. A copy of the Asset Purchase Agreement is enclosed with this Response. When the Compact Disc is received, a copy will be provided.

4. Identify the current owner and/or operator of the Site. State the dates during which the current owner and/or operator owned, operated, or leased any portion of the Site and provide copies of all document evidencing or relating to such ownership, operation, or lease, including, but not limited to purchase and sale agreements, deed, leases, indemnification documents, etc.

**Response:**

The plant and assets of the chemical operations owned by Wright Chemical Corporation at the time of the Asset Purchase Agreement were sold to Oak-Bark Corporation in November 2004. Upon information and belief, at least a part of the site is operated by Oak-Bark. Respondent is without knowledge as to others who have since become owners or operators of portions of the site. A copy of the Asset Purchase Agreement and relevant closing documents are enclosed with this Response.

5. If you are not the owner and/or operator of the Site, state the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including, but not limited to purchase and sale agreements, deeds, leases, indemnification documents, etc.

**Response:**

Respondent is not the owner or operator of the Site. Wright Chemical Corporation operated the site or portions thereof from 1959 until the sale to Oak-Bark in November 2004. All documents related to the Site and the operations were delivered to possession of the purchaser, Oak-Bark. A copy of the Asset Purchase Agreement is enclosed with this Response.

6. Identify any persons who concurrently with you exercised actual control or who held significant authority to control activities at the Site.
  - a. Partners or joint ventures;
  - b. Any contractor, subcontractor, of licensor with any presence or activity on the Site (service contractors, remediation contractors, management and operator contractors, licensor providing technical support to licensed activities);
  - c. Any person leasing the Site;

- d. Utilities, pipelines, railroads and any other person with activities and/or easements regarding the Site;
- e. Major financiers and lenders;
- f. Any person who exercised actual control over any activity or operations on Site;
- g. Any person who held significant authority to control activities or operations on Site;

**Response:**

No person or entity exercised actual control or held significant authority to control activities of Wright Chemical Corporation at the Site during the period that it operated at the Site. Department of Environment and Natural Resources of the State of North Carolina were on Site at regular intervals monitoring compliance with permits.

- c. Koch Sulfur Products Company leased two acres, more or less, from Wright Chemical Corporation north of the CSX Railroad tracks beginning in 1990 manufacturing sulfuric acid by contact process for less than a year. All records were delivered to the possession of Oak-Bark upon sale. Respondent has no knowledge of any release or threatened release of hazardous substances.
  - f. Kaiser Aluminum & Chemical Corporation owned 23 acres, more or less, located south of the CSX Railroad tracks about the mid-1980s. It produced superphosphate at the Site. Wright Chemical Corporation acquired the property from Kaiser. All records were delivered to the possession of Oak-Bark upon sale.
7. At the time you acquired or operated the Site, did you know or have reason to know that any hazardous substances were disposed of, on or at the Site? Describe all investigations of the Site you undertook prior to acquiring the Site and all of the facts on which you base the answer to this question.

**Response:**

Prior to 1959 when Wright Chemical Corporation was formed, predecessors had operated chemical operations on portions of the Site adjacent to the plant site, upon information and belief, since 1893. Photographs from the nineteenth century as well as a painting depict the operation of a fertilizer manufacturing plant and a sulfuric acid manufacturing plant. Materials handling practices and waste disposal practices during that period are unknown. Thomas H.

Wright III was employed by Wright Chemical Corporation in 1978. The appearance of a red clay material in the soil to the north of the plant Site would indicate that the area was used as a disposal site in previous operations.

The Site adjacent and south was sold to Kaiser Agricultural Chemicals on which it operated an enlarged fertilizer mill and agricultural chemical distribution business.

Respondent is not aware of any investigations of the Site prior to Wright Chemical Corporation acquiring the site.

8. Did you acquire the Site, or any portion thereof, by inheritance or bequest? Describe all facts on which you base the answer to this question.

**Response:**

Respondent did not acquire the Site, or any portion thereof, by inheritance or bequest. A corporation cannot acquire property by inheritance or bequest.

9. Did you purchase the Site, or any portion thereof, for a price that was less than fair market value due to contamination or other factor? Please describe all the facts on which you base the answer to this question.

**Response:**

Thomas H. Wright III has no knowledge of the value of the Site when it was acquired by Wright Chemical Corporation or its condition at the time of acquisition.

10. Provide copies of your sale/purchase agreement for the above referenced property along with any relevant documents pertaining to your acquisition of the property, including, but not limited to, any indemnification agreements or notices of contamination of the property.

**Response:**

As noted previously, a copy of the Asset Purchase Agreement between Wright Chemical Corporation and Oak-Bark Corporation, together with all relevant closing documents, accompanies these Responses. All other records are in the possession of Oak-Bark Corporation.

11. Provide information about the Site, including but not limited to the following:

- a. Property boundaries, including a written legal description;
- b. Location of groundwater wells or underground utilities (telephone, electrical, sewer, water main, etc);
- c. Storm water drainage system or sanitary sewer system, including septic tank(s), subsurface disposal field(s), and other underground structures and where, when and how such systems are emptied;
- d. All maps and drawings of the Site in your possession.

**Response:**

Except for an unsigned copy of the deed included in the closing documents accompanying the Asset Purchase Agreement, all documents responsive to this Request were delivered to the possession of Oak-Bark Corporation, the purchaser of the chemical assets and plant Site.

12. Describe the nature of your activities or business at the Site.

**Response:**

Respondent conducts no activities or business at the Site.

- A. Wright Chemical Corporation manufactured sulfuric acid, liquid alum, urea-formaldehyde, hexamine, formaldehyde, 20% aqua ammonia, DS-2 (a decontaminating substance for the US Army), Ketone aldehyde resins, groutweight, sodium meta bisulfite, paraformaldehyde, water treatment chemicals, cellulous solutions, Quat 311, vanadium oxalate, 30% aqua ammonia, aniline formaldehyde, silanes, and fine chemicals.
- B. Koch Sulfur Products Company leased two acres, more or less, north of the CSX Railroad tracks from Wright Chemical Corporation in 1990 and manufactured sulfuric acid by the contact process for less than a year. Except for the Asset Purchase Agreement and closing documents attached, all records and documents were delivered to the possession of Oak-Bark. Respondent has no knowledge of releases or threats of release of hazardous chemicals by Koch.

C. Kaiser Aluminum & Chemical Corporation owned 23 acres, more or less, located south of the CSX Railroad tracks about the mid-1980s. It produced superphosphate at the Site. Wright Chemical Corporation acquired the property from Kaiser. All records were delivered to the possession of Oak-Bark upon sale.

13. Did you ever use, purchase, generate, store, treat, deposit, or otherwise handle at the Site any hazardous substances? If the answer to the preceding question is anything other than an unqualified "no," identify:

- a. In general terms the nature and quantity of the non-hazardous substances that were used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site.
- b. The chemical composition, characteristics, physical state (e.g. solid, liquid) of each hazardous substances so used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site.
- c. The persons who supplied you with each such hazardous substance.
- d. When and how each such hazardous substance was used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site.

**Response:**

Wright Chemical Corporation purchased, stored, used, and produced hazardous and non-hazardous substances on the Site. All records of such substances and quantities produced were delivered to Oak-Bark which purchased the on-going operations as well as the chemical substances and the plant Site. Respondent has no records from which to provide the responses. Oak-Bark Corporation is in the best position to respond to this Question.

14. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the Site during your ownership or operation. Provide copies of all documents associated with such occurrences.

**Response:**

Respondent does not have the documents from which to supply the response, as they were delivered to the possession of Oak-Bark with the purchase of the chemical assets and plant Site.

A detailed response would require access to the records of Wright Chemical Corporation, which are in the possession of Oak-Bark, and an extension of time to review them. Oak-Bark assumed the obligations to continue management of the Site, and with possession of all records and documents, is in the best position to respond this request.

Respondent recalls that there was an acetone spill that was promptly reported to the North Carolina Department of Environment and Natural Resources which required installation of monitoring wells. Additionally, there was a sulfuric acid spill reported and monitoring wells installed. In both instances, the substances cleared naturally over time. Records which were delivered to Oak-Bark would reveal the details of the spills, as would the records of DENR.

15. Provide a list of all local, state, and federal environmental permits granted for the Site or any part thereof (e.g., RCRA Permits, NPDES Permits, etc.)

**Response:**

Respondent holds no permits. All permits were delivered to the possession of Oak-Bark with the purchase of the chemical assets and the plant Site.

16. Describe the acts or omissions of any persons, other than your employees, agents or those persons with whom you had a contractual relationship that may have caused the release or threat of hazardous materials at the Site. In addition:

- a. Describe all precautions that you took against foreseeable acts or omissions of any such third parties, including but not limited to, Heck Sealant, Hexion Specialty Chemicals, Kaiser Aluminum & Chemical Corporation, Acme Chemicals, Inc., Koch Sulfur Products Company, Oak-Bark Corporation, Silar, LLC, and the consequences that could foreseeably result from such acts or omissions.
- b. Describe the care you exercised with respect to the hazardous materials at the Site. In other words, describe any affirmative acts you have taken to address the hazardous materials at the Site, including any actions to mitigate continuing releases into the environment and to limit the threat posed to human health or the environment.

**Response:**

None. Wright Chemical Corporation controlled the site during its operations.

- a. Wright Chemical Corporation operated a waste treatment facility from the early 1970s until the sale to Oak-Bark to meet surface water and air permits enforced by the North Carolina Department of Environment and Natural Resources. Under agreements with DENR, three waste lagoons were eliminated and replaced with a large lined impoundment for solid waste and two large lined ponds to accommodate the liquid waste generated by the hexane production facility. A new waste treatment plant, operating a novel and unique system of filtration and biological treatment of hexane waste water, was designed after several on-site control tests and built by Wright Chemical Corporation. Years later, Wright Chemical Corporation under the request from State enforcement officials, designed, planned and advocated for a publicly owned facility to add greater capacity to meet the ever tightening requirements for water discharge to the Livingston Creek surface waters. This latest treatment plant, for which Wright Chemical Corporation donated in excess of \$800,000.00, was built after the sale to Oak-Bark. During Wright Chemical Corporation's operation of the manufacturing facility, these improvements reduced and/or eliminated the sources for ground water combination, which is evidenced in the extensive ground water records, and a resulting improvement was observed in the levels of contamination found in the wells that were monitored. The publicly owned and operated waste facility was to be designed to carry extra capacity to handle waste from industrial growth, residential neighbors, as well as any future demands by the State of North Carolina for a pump and treatment program of ground waters. These expenditures and plans were approved by the Board of Directors and given priority in the budgets for use of funds available to the corporation. A further detailed response would require access to the records of environmental management which are in the possession of Oak-Bark, and there is a long history of control of air and surface water discharges.
  - b. See response to "a." The Site was much cleaner when it was sold in 2004 than it was when Thomas H. Wright III was employed in 1978.
17. Describe all current and past arrangements or contractual relationships that you have or had with the following entities: Heck Sealant, Hexion Specialty Chemicals, Oak-Bark Corporation, Kaiser Aluminum & Chemical Corporation, Acme Chemicals, Inc. and Koch Sulfur Products Company.

**Response:**

Respondent has the contractual relationship specified in the Asset Purchase Agreement with Oak-Bark Corporation, including environmental liability. Oak-Bark also rents the office building from Respondent.

18. To the extent you have knowledge, for each and every past or current owner, operator, lessor, or lessee of any portion of the Site, other than you:

- a. Identify such person and the nature of their operation at the Site;
- b. Describe the portion of the Site owned, operated, or leased by each such person and state the dates during which each portion was owned, operated or leased;
- c. Provide copies of all documents evidencing or relating to such ownership, operation or lease, including but not limited to purchase and sale agreements, deeds, leases, etc;
- d. Provide all evidence that hazardous materials were released or threatened to be released at the Site during the period that they owned the Site.

**Response:**

To the knowledge of Respondent, the following are known past owners:

Wright Chemical Corporation:

- D. It manufactured sulfuric acid, liquid alum, urea-formaldehyde, hexamine, formaldehyde, 20% aqua ammonia, DS-2 (a decontaminating substance for the US Army), Ketone aldehyde resins, groutweight, sodium meta bisulfite, paraformaldehyde, water treatment chemicals, cellulous solutions, Quat 311, vanadium oxalate, 30% aqua ammonia, aniline formaldehyde, silanes, and fine chemicals.
- E. It owned the Site north of the CSX Railroad tracks until the Asset Purchase Agreement sale to Oak-Bark in 2004. The Site south of the railroad track was acquired from Kaiser Aluminum & Chemical Corporation.

Koch Sulfur Products Company leased two acres, more or less, north of the CSX Railroad tracks from Wright Chemical Corporation in 1990 and manufactured sulfuric acid by the contact process for less than a year. Except for the Asset Purchase Agreement and closing documents attached, all records and documents were delivered to the possession of Oak-Bark. Respondent has no knowledge of releases or threats of release of hazardous chemicals by Koch.

19. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrogeology, or air quality on or about the Site?

**Response:**

No. Upon purchase, Oak-Bark Corporation assumed the monitoring of air and water quality to comply with the permits from the State of North Carolina.

20. Describe the nature/organizational structure of your business, including state incorporations, subsidiaries, parent companies, and number of employees.

**Response:**

Respondent is incorporated in the State of North Carolina. It has no subsidiaries, no parent companies, and no employees. It owns two historic buildings in downtown Wilmington which are rented.

21. Identify the officers, managers, and majority shareholders of Wright Chemical Corporation and the nature of their management duties, and amount of shares held, respectively.

**Response:**

The officers of William Gilchrist Wright Properties, Inc. are Thomas H. Wright III, Chairman, and Elizabeth L. Wright, Secretary. There are no managers. The shareholders are as follows:

Thomas H. Wright III,	24%, Chairman, Director
Elizabeth L. Wright	16%, Secretary, Director
Elizabeth W. McMillen	20%, Director
Margaret Wright	20%
Eleanor W. Lindemann	20%

22. Identify all persons who may be responsible for the liabilities of Respondent arising from or relating to the release or threatened release of hazardous substances at the Site, including but not limited to successors, officers, and individuals.

**Response:**

Respondent must respectfully deny the premise of the Request that it has liability for releases or threatened releases of hazardous substances at the Site. Respondent can identify no person

who may be liable for any release or threatened release of hazardous substances at the Site. If it should be determined that Respondent has any liability for releases or threatened releases of hazardous substances, such liabilities were assumed by Oak-Bark Corporation in the Asset Purchase Agreement.

23. Identify any of the employees, officers, managers, and/or majority shareholders of Wright Chemical Corporation that had any previous involvement, knowledge, or engaged in any activities at the property prior to Wright Chemical Corporation purchase of the property. Describe in detail the previous involvement, knowledge or activities.

**Response:**

Respondent knows of no one who had previous involvement, knowledge, or engaged in any activities at the property prior to Wright Chemical Corporation's acquisition of the property.

24. Identify any of the employees, officers, managers, and/or majority shareholder of Wright Chemical Corporation that were in any way connected with any person or entity that previously owned and/or operated the Site. Describe the nature of the previous connection along with details as to the previous owner and/or operator.

**Response:**

Prior to the time Thomas H. Wright III was employed by Wright Chemical Corporation, the plant was operated by Thomas H. Wright, Jr., father of Thomas H. Wright III.

William E. Oakley was employed by Wright Chemical Corporation about 1978 as Executive Vice-President. He became President in 1984. He oversaw all operations of the company and reported to Thomas H. Wright, Jr. until his death in 1994 and thereafter to Thomas H. Wright III until the sale to Oak-Bark. He served as a directors for many years.

James C. Barker was employed by Wright Chemical Corporation about 1979 as engineering manager. In 1984 he became Vice-President overseeing sales, market development, and research until the sale to Oak-Bark. He served as a director for many years.

Gail Wise was employed by Wright Chemical Corporation about 1984 in the accounting department.

Red Lewis was employed about 1980 as sulfuric acid plant manager; in 1989 as maintenance manager; and in 2003 as plant production manager.

Marvin Freeman was employed about 1995 as personnel officer and safety officer.

Mark Zenner was employed about 2000 as a formaldehyde operator and later in sales and customer service.

Corey Faison was employed about 2001 as a hexamine material handler.

Douglas Johnson was employed about 2003 as a hexamine material handler.

DeShawn Bryant was hired about 2004 as a hexamine materials handler.

25. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**Response:**

- A. William E. Oakley, Oak-Bark Corporation, 102 Orange Street, Wilmington, NC 28401. All records of Wright Chemical Corporation were delivered to the possession of Oak-Bark upon closing the sale of the chemical assets and the plant Site in November 2004. Mr. Oakley was in charge of all operations at the plant from 1978.
- B. James Barker, Oak-Bark Corporation, 102 Orange Street, Wilmington, NC 28401. All records of Wright Chemical Corporation were delivered to the possession of Oak-Bark upon closing the sale of the chemical assets and the plant Site I November 2004. He was a long time vice-president of the corporation.
- C. David Swart served as head of engineering. He is knowledgeable about the systems used by Wright Chemical Corporation to comply with regulations.
- D. Anthony Smith served as environmental engineer.
- E. John (Jack) Sherrill, Sherrill Environmental, Inc. (the firm did test well monitoring for decades)

F. North Carolina Department of Environment and Natural Resources which enforced controls of air and water permits.

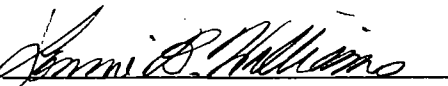
26. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

**Response:**

As noted throughout these Responses and particularly in Response 25, all documents were delivered to the possession of Oak-Bark Corporation when the Asset Purchase Agreement closed in November 2004. William E. Oakley has been identified as the person in the best position to respond to the Requests and to provide documents.

Respondent will comply with the obligation to provide additional responses with information obtained following the submittal of this Response.

Sincerely,  
MARSHALL, WILLIAMS & GORHAM, LLP

By:   
Lonnie B. Williams

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